

1 Dario de Ghetaldi – Bar No. 126782
2 Amanda L. Riddle – Bar No. 215221
3 Steven M. Berki – Bar No. 245426
4 Sumble Manzoor – Bar No. 301704
5 **COREY, LUZAICH,
DE GHETALDI & RIDDLE LLP**
6 700 El Camino Real
7 P.O. Box 669
8 Millbrae, CA 94030-0669
Telephone: (650) 871-5666
Facsimile: (650) 871-4144
deg@coreylaw.com
alr@coreylaw.com
smb@coreylaw.com
sm@coreylaw.com

9 Michael S. Danko – Bar No. 111359
10 Kristine K. Meredith – Bar No. 158243
Shawn R. Miller – Bar No. 238447
DANKO MEREDITH
11 333 Twin Dolphin Drive, Suite 145
Redwood Shores, CA 94065
12 Telephone: (650) 453-3600
Facsimile: (650) 394-8672
13 mdanko@dankolaw.com
kmeredith@dankolaw.com
smiller@dankolaw.com

Eric Gibbs – Bar No. 178658
Dylan Hughes – Bar No. 209113
GIBBS LAW GROUP
505 14th Street, Suite 1110
Oakland, CA 94612
Telephone: (510) 350-9700
Facsimile: (510) 350-9701
ehg@classlawgroup.com
dsh@classlawgroup.com

15 Attorneys for Individual Butte Fire, North Bay Fires,
And Camp Fire Victim Claimants

16 UNITED STATES BANKRUPTCY COURT

17 NORTHERN DISTRICT OF CALIFORNIA

18 SAN FRANCISCO DIVISION

19 In re

20 PG&E CORPORATION and
21 PACIFIC GAS AND ELECTRIC
COMPANY,

22 Debtors.

23 _____
24 □ Affects PG&E Corporation

25 □ Affects Pacific Gas and Electric Company

26 ☑ Affects both Debtors

27 *All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

) Case No. 19-30088 (DM)

) Chapter 11

) (Lead Case)

) (Jointly Administered)

) **DECLARATION OF BRADFORD
BOWEN IN SUPPORT OF INDIVIDUAL
BUTTE FIRE, NORTH BAY FIRES,
AND CAMP FIRE VICTIM
CLAIMANTS' OBJECTION TO
DEBTORS' "BAR DATE MOTION"
(DKT. NO. 1784)**

) Date: June 11, 2019

) Time: 9:30 a.m. (Pacific Daylight Time)

) Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

) Objection Deadline: May 28, 2019

1 I, BRADORD L.W. BOWEN, declare:

- 2 1. I am an attorney with the law firm of Danko Meredith. I have been working on the Camp Fire
3 cases since November 11, 2018 During that time, I have met with and spoken to hundreds of
4 Camp Fire victims.
- 5 2. Many of our clients with whom I have spoken and met have not been able to start rebuilding
6 their lives. Many of our clients are still struggling to find a minimum level of stability in their
7 lives after the fire. Particularly affected are our clients on fixed incomes, with physical and
8 mental health concerns, or who over a certain age.
- 9 3. Many of our clients with whom I have spoken and met do not have a permanent living situation
10 set up yet. Many who do are living in trailers on other people's property. Many others have
11 had to move far away and out of the state in order to find housing.
- 12 4. Many of our clients have been unable to maintain cell phone numbers, addresses, or email
13 contact. Many have never used email before, and many of those who had, have been unable to
14 find consistent internet access. Many clients do not have a smart phone. Many more do not get
15 service at their homes.
- 16 5. Many clients' time is spent on significantly increased commute times, looking for housing,
17 caring for family members affected by the fire, dealing with insurance, cleaning their properties
18 of safety hazards – all of which require their immediate attention.
- 19 6. Many clients only kept hard copies of records, photographs and documents, which were
20 destroyed in the fire. It has been impossible for them to get replacements for a variety of
21 reasons.
- 22 7. We have clients who we have had to contact indirectly – through their family or friends –
23 because they did not have reliable access to a phone or internet.
- 24 8. Many clients do not know when their property will be cleared of debris, have clean water, if
25 they need to install a septic system or sewer hookup, what or when their final payments from
26 their insurance companies will be.
- 27 9. I have spoken with hundreds of affected individuals who are not our clients. Many of them
28 seem unable to process what happened to them and what they need to move forward. I firmly
believe that requiring an unduly comprehensive proof of claim form will prohibit many of

1 believe that requiring an unduly comprehensive proof of claim form will prohibit many of
2 those who have been unable to even retain counsel due to their emotional and mental state,
3 those who need the court the most, from accessing and seeking justice.

4

5 I declare under penalty of perjury that the foregoing is true and correct of my own personal
6 knowledge. Executed this 28th day of May, 2019, at Redwood Shores, California.

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10 BRADFORD L.W. BOWEN

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